

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

RAMONA THURMAN BIVINS,)	
)	
Plaintiff,)	
)	CIVIL ACTION NO.:
vs.)	1:22-cv-04149-WMR
)	
FELICIA FRANKLIN, in her individual)	JURY TRIAL DEMANDED
and official capacities;)	
ALIEKA ANDERSON, in her individual)	
and official capacities;)	
GAIL HAMBRICK, in her individual)	
and official capacities; and)	
CLAYTON COUNTY, GEORGIA,)	
)	
)	
Defendants.)	

**PLAINTIFF’S CONSENT MOTION FOR AN EXTENSION OF TIME TO
RESPOND TO DEFENDANTS GAIL HAMBRICK’S AND CLAYTON
COUNTY, GEORGIA’S MOTION TO DISMISS PLAINTIFF’S
COMPLAINT**

COMES NOW, Plaintiff Ramona Thurman Bivins (“Ms. Bivins”), and moves this Court for an Order extending the time period for her response to the Motion to Dismiss filed by Defendants Gail Hambrick, in her individual and official capacities, and Clayton County, Georgia (“Defendants Hambrick and Clayton County”) [ECF No. 22], through and including January 9, 2023, showing the Court as follows:

1. On October 17, 2022, Plaintiff filed her initial Complaint for Damages and Injunctive Relief against Defendants Felicia Franklin (“Franklin”), in her individual and official capacities, Alieka Anderson (“Anderson”), in her individual and official capacities, Gail Hambrick, in her individual and official capacities, and Clayton County, Georgia. [ECF. 1].

2. On November 22, 2022, Defendant Anderson filed her Answer to Plaintiff’s Complaint. [ECF No. 19].

3. On December 5, 2022, Defendants Hambrick and Clayton County filed their Motion to Dismiss Plaintiff’s Complaint. [ECF No. 22].

4. Upon motion on December 5, 2022 by Defendants Hambrick and Clayton County to stay all discovery [ECF No. 23], the Court entered an Order [ECF No. 24] on December 5, 2022 staying all discovery in this matter pending the final resolution of Defendants’ Motion to Dismiss.

5. On December 12, 2022, Defendant Franklin filed her Answer to Plaintiff’s Complaint. [ECF No. 25].

6. Plaintiff’s response to Defendants Hambrick’s and Clayton County’s Motion to Dismiss Plaintiff’s Complaint is currently due on December 19, 2022.

7. In light of the upcoming holidays and numerous court deadlines in other matters, Plaintiff respectfully requests a twenty-one (21) day extension of

time to file her response to the Motion to Dismiss filed by Defendants Hambrick and Clayton County through and including January 9, 2023.

8. Counsel for Plaintiff conferred with counsel for Defendants Hambrick and Clayton County regarding the relief sought in this motion, and Counsel for Defendants Hambrick and Clayton County consent to this motion.

9. The requested extension will not prejudice any party and is sought in good faith and not for the purposes of delay or any other purpose contrary to the Federal Rules of Civil Procedure and the Local Rules of this Court.

WHEREFORE, Plaintiff respectfully requests the Court grant her Motion for an Extension of Time to Respond to Defendants Gail Hambrick's and Clayton County's Motion to Dismiss Plaintiff's Complaint [ECF No. 22], extending the deadline to January 9, 2023.

A proposed Order is attached herewith.

Respectfully submitted this 16th day of December, 2022.

BUCKLEY BEAL LLP

By: /s/ Andrew R. Tate
Edward D. Buckley
Georgia Bar No. 092750
edbuckley@buckleybeal.com
Andrew R. Tate
Georgia Bar No. 518068
atate@buckleybeal.com

600 Peachtree Street NE
Suite 3900
Atlanta, GA 30308
Telephone: (404) 781-1100
Facsimile: (404) 781-1101
Counsel for Plaintiff

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

RAMONA THURMAN BIVINS,)	
)	
Plaintiff,)	
)	CIVIL ACTION NO.:
vs.)	1:22-cv-04149-WMR
)	
FELICIA FRANKLIN, in her individual)	JURY TRIAL DEMANDED
and official capacities;)	
ALIEKA ANDERSON, in her individual)	
and official capacities;)	
GAIL HAMBRICK, in her individual)	
and official capacities; and)	
CLAYTON COUNTY, GEORGIA,)	
)	
)	
Defendants.)	

CERTIFICATE OF SERVICE

I hereby certify that on December 16, 2022, I electronically filed the above **PLAINTIFF’S CONSENT MOTION FOR AN EXTENSION OF TIME TO RESPOND TO DEFENDANTS GAIL HAMBRICK’S AND CLAYTON COUNTY, GEORGIA’S MOTION TO DISMISS PLAINTIFF’S COMPLAINT** with the Clerk of Court using the CM/ECF system, which will automatically send email notification of such filing to the following attorneys of record:

A. Ali Sabzevari - asabzevari@fmglaw.com
Kirsten S. Daughdril - kirsten.daughdril@fmglaw.com
John D. Bennett - jbennett@fmglaw.com
Jack R. Hancock - jhancock@fmglaw.com
Ken E. Jarrard - kjarrard@jarrard-davis.com
Melissa A. Tracy - mtracy@jarrard-davis.com
Randall C. Farmer - rfarmer@gdcrlaw.com
Dasha M. Jackson - djackson@gdcrlaw.com

BUCKLEY BEAL LLP

By: /s/ Andrew R. Tate
Andrew R. Tate
Georgia Bar No. 518068